IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	CASE NO. 08-06050-ESL
SONIA N. FLORES RIOS	*	CHAPTER 13
DEBTORS	*	
BANCO BILBAO VIZCAYA-ARGENTARIA	*	INDEX
Movant	*	
SONIA N. FLORES RIOS	*	
Respondent (s)		

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY FILED BY BANCO BILBAO VIZCAYA-ARGENTARIA, DOCKET NO. 38

TO THE HONORABLE COURT:

NOW COMES, **SONIA N. FLORES RIOS,** debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. Banco Bilbao Vizcaya-Argentaria ("BBVA") filed a motion for relief from the automatic stay basically alleging that debtor is in arrears in three (3) post-petition direct payments to said creditor, in the sum of $3,107.86, including late charges, costs and legal fees.

2. The debtor hereby respectfully submits that on May 27, 2011 she made the payment to pay the months of: April 2011 and May 2011, and on July 13, 2011 she made two (2) payments to BBVA to cure the months of: June and July 2011. Attached is evidence of payments.

3. Furthermore, the debtor proposes to cover the $500.00 for costs and legal fees to be paid to said creditor and debtor need an extension of time of thirty (30) days from the date of hearing August 2, 2011 to cure pending balance on arrears.

4. Based on the aforestated, and upon the payment of the costs and legal fees to BBVA, the debtor hereby respectfully requests this Honorable Court deny the motion requesting relief from stay filed by BBVA, since there exists no "cause" to lift the stay in the present case.

WHEREFORE, debtor respectfully requests from this Honorable Court to deny the motion for relief from stay filed by BBVA in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee Jose R. Carrion, Esq.; Montañez & Alicea Law Offices, Esq., Attorney for BBVA; I also certify that a copy of this motion has been sent via US Postal Service to the debtors/respondents Sonia N. Flores Rios PMB 375 PO Box 4956 Caguas PR 00726.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 15th day of July, 2011.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR DEBTOR/RESPONDENT
PO BOX 193677 SAN JUAN PR 00919-3677
TEL NO 787-744-7699FAX NO 787-746-5294
EMAIL: rfc.rfclaw@gmail.com

UNITED STATES POSTAL SERVICE®

POSTAL MONEY ORDER

Serial Number

19062242818

Year, Month, Day	Post Office	U.S. Dollars and Cents
2011-07-13	007251	**$842.00**

Amount **EIGHT HUNDRED FORTY TWO DOLLARS & 00c ********

Pay to *Banco Bilvao Vizcaya Argentaria*

Clerk

Address

0810100/0000

From *Juria M. Flores Rios* 0009

Memo *SVR. 000622838-0 July 2011*

Address *PMB 375 PO Box 4956*

Caguas P.R. 00726

SEE REVERSE WARNING • NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS

⑆00000800 2⑈ 19062242818⑈

UNITED STATES POSTAL SERVICE®

POSTAL MONEY ORDER

Serial Number

19062242820

Year, Month, Day	Post Office	U.S. Dollars and Cents
2011-07-13	007251	**$884.00**

Amount **EIGHT HUNDRED EIGHTY FOUR DOLLARS & 00c ******

Clerk

Pay to *Banco Bilvao Vizcaya Argentaria* 0009

Address

0810100/0000

From *Juria M. Flores Rios*

Memo *for: 000-622838-0 June 2011*

Address *PMB 375 PO Box 4956*

Caguas P.R. 00726

SEE REVERSE WARNING • NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS

⑆00000800 2⑈ 19062242820⑈

BBVA

Cupón Provisional de Pago - Préstamo Hipotecario
Mortgage Loan System Substitute Payment Coupon

T/C	Número de Cuenta / Account Number	Vence en / Due on	Pago Mensual
0014	08101001622838C	Mes/Mo Día/Day Año/Year	Monthly Payment

Nombre y Dirección del Cliente / Customer's Name and Address

Número de Teléfono / Telephone Number

Cargo por Demora / Late Charge

Juria Flores Rios

Pague esta Cantidad / Pay this Amount

	T/C	Partidas Adicionales / Additional Items	
	351	Abono al Principal / Payment to Principal	
	132	Recargos Pendientes / Outstanding Charges	

Preparado por / Prepared by

Fecha / Date
(REPB)
BV 142001696

Total

Nota: Use un cupón para cada pago mensual. / *Note: Use one coupon for each monthly payment.*